

1 Thomas G. Ryan
Nevada Bar No. 9378
2 Lisa Wong Lackland
Nevada Bar No. 9934
3 Emily Gubler Clark
Nevada Bar No. 10547
4 LEWIS AND ROCA LLP
3993 Howard Hughes Parkway, Suite 600
5 Las Vegas, NV 89169
Telephone: (702) 949-8200
6 Facsimile: (702) 949-8366

7 *Attorneys for Defendant*
8 *TechSkills, LLC*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 MOBIUS CONNECTIONS GROUP, INC., a
12 Nevada corporation,

13 Plaintiff,

14 vs.

15 TECHSKILLS, LLC, a foreign Limited
Liability Company; DOES I-X and ROES I-X,
16 inclusive,

17 Defendants.

Case No. 2:10-cv-01678-GMN-RJJ

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

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19 Plaintiff Mobius Connections Group, Inc., and defendant TechSkills, LLC, through their
20 respective counsel, hereby submit the following proposed Stipulated Discovery Plan and
21 Scheduling Order pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1.

22 **1. Conference:** Pursuant to Federal Rule of Civil Procedure 26(f), counsel for the
23 parties conferred telephonically on December 1, 2010. As required, during this conference
24 counsel considered the nature and basis of their client's claims and defenses and the possibility of
25 prompt settlement of this action. Counsel discussed the timing and other arrangements pertaining
26 to the initial disclosures required by Rule 26(a)(1), discussed issues concerning preservation of
27 discoverable information and developed a proposed discovery plan.
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2. **Discovery Plan:**

A. Initial Disclosures: Pursuant to Rule 26(a)(1)(C), and by agreement of the parties, the parties will exchange initial disclosures no later than January 14, 2011. While this date is approximately seventy-five (75) days after the filing of TechSkills' answer and approximately forty-five (45) days after the parties Rule 26(f) conference, the extension is required in order to allow sufficient time for the parties, and, in particular, TechSkills, to review voluminous potentially relevant emails and other electronically-stored information.

B. Areas of Discovery: Discovery will be needed to address all issues, including all claims and defenses within the scope of the parties' pleadings.

C. Discovery Cut-Off Date: The parties propose a discovery cutoff date of July 13, 2011, which is one hundred eighty (180) days following the parties' proposed deadline for serving initial disclosures.

D. Amendments to Pleadings and Addition of Parties: Pursuant to Local Rule 26-1(e)(2), the parties shall have until April 14, 2011 to file any motions to amend the pleadings or to add parties. This date is ninety (90) days before the parties' proposed discovery cut-off date.

E. Federal Rule of Civil Procedure 26(a)(2) Expert Disclosures: Disclosure of experts shall be made no later than May 16, 2011, which is the next closest day to sixty (60) days before the parties' proposed discovery cut-off date. Disclosures of any rebuttal experts shall be made no later than June 13, 2011, which is within thirty (30) days after the parties' initial disclosure of experts.

F. Interim Status Report: Pursuant to Local Rule 26-3, the parties shall submit an interim status report no later than May 16, 2011, which is the next closest day to sixty (60) days before the parties' proposed discovery cut-off date.

1 G. Dispositive Motions: Pursuant to Local Rule 26-1(e)(4), the parties
2 shall have until August 12, 2011 to file dispositive motions. The date is within
3 thirty (30) days after the parties' proposed discovery cut-off date.

4 H. Pretrial Order: Pursuant to Local Rule 26-1(e)(5), the joint pretrial
5 order shall be filed by September 9, 2011. This date is within thirty (30) days after
6 the deadline for filing dispositive motions. In the event that dispositive motions are
7 filed, the date for filing the joint pretrial order shall be suspended until thirty (30)
8 days after decision on such motion(s) or further order of the Court. The disclosures
9 required by Federal Rule of Civil Procedure 26(a)(3), and any objections thereto,
10 shall be made in the joint pretrial order.

11 3. **Limitations on Discovery**: At this time, the parties propose no changes to
12 the form or scope of discovery imposed by the Federal Rules of Civil Procedure or the Local
13 Rules, other than the extension of certain deadlines as noted above. The parties, however, reserve
14 their right to seek changes to the limitations on the form or scope of discovery, as and if necessary,
15 at a later date.

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1 4. **Court Conference:** The parties do not believe that a conference is
2 necessary, unless the Court feels it would be useful to hear from the parties with respect to their
3 proposed scheduling plan.

4 DATED: December 13, 2010.

5 REYNOLDS & ASSOCIATES

6 LEWIS AND ROCA LLP

7 By: /s/ Ronald H. Reynolds

8 RONALD H. REYNOLDS, NV Bar 827

9 823 Las Vegas Blvd. South, Suite 280

10 Las Vegas, NV 89101

11 Attorney for Plaintiff, MOBIUS CONNECTIONS
12 GROUP, INC.

13 By: /s/ Thomas G. Ryan

14 THOMAS G. RYAN, NV Bar 9378


15 3993 Howard Hughes Pkwy., #600

16 Las Vegas, NV 89169

17 Attorney for Defendant, TECHSKILLS,
18 LLC

19 **ORDER**

20 IT IS SO ORDERED:

21 
22 UNITED STATES MAGISTRATE JUDGE
23 DATED: DEC. 20, 2010